

FILED**NOV 20 2013**

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)	
)	CRIMINAL NO. 13-30147-DRH
Plaintiff,)	
)	Title 18 United States Code,
vs.)	Sections 924(a)(1)(A), 924(d) and
)	1001(a)(2)
KATRELL M. TROTTER)	
)	Title 28, United States Code,
Defendant.)	Section 2461(c)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

MAKING A FALSE STATEMENT DURING THE PURCHASE OF A FIREARM

On or about April 13, 2011, in St. Clair County, Illinois, within the Southern District of Illinois,

KATRELL M. TROTTER,

defendant herein, knowingly made a false statement and representation to Ron and Jo's Firearms and Sporting Supplies, Inc., a business licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Ron and Jo's Firearms and Sporting Supplies, Inc., in that the defendant falsely stated and represented that he was not under an indictment or information in court for a felony, or any other crime, for which a judge could imprison him for more than one year on a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, whereas in truth and in fact, he was under an indictment or information in court for a felony, or any other crime, for which a judge could

imprison him for more than one year; all in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT 2

MAKING A FALSE STATEMENT DURING THE PURCHASE OF A FIREARM

On or about March 6, 2009, in St. Clair County, Illinois, within the Southern District of Illinois,

KATRELL M. TROTTER,

defendant herein, knowingly made a false statement and representation to Ron and Jo's Firearms and Sporting Supplies, Inc., a business licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Ron and Jo's Firearms and Sporting Supplies, Inc., in that the defendant falsely stated and represented that he was the actual transferee/buyer of the firearm sought to be purchased on the above date on a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, whereas in truth and in fact, he was not the actual transferee/buyer of the firearm sought to be purchased on the above date; all in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT 3

**MAKING A FALSE STATEMENT TO A SPECIAL AGENT OF THE BUREAU OF ALCOHOL,
TOBACCO, FIREARMS AND EXPLOSIVES**

On or about July 14, 2010, in Madison County, Illinois, within the Southern District of Illinois,

KATRELL M. TROTTER,

defendant herein, did willfully and knowingly make, and cause to be made, a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of a

department or agency of the United States by telling Special Agents with the Bureau of Alcohol, Tobacco, Firearms and Explosives that his New England .32 caliber revolver had been stolen from his bedroom by B.W. during a federal criminal investigation pertaining to the defendant making false statements during the purchase of firearms, all in violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATION

Upon conviction of Count 1 as alleged in the indictment, defendant **KATRELL M. TROTTER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in or used in any knowing violation of the offense described in Count 1 of this Indictment, including, but not limited to the following: (1) a Smith and Wesson 9mm pistol, Model 5946, with a serial #VDK2659 and (2) any and all ammunition contained therein.

A TRUE BILL


FOREPERSON


NEAL C. HONG
Special Assistant United States Attorney


ANGELA SCOTT
Assistant United States Attorney


STEPHEN R. WIGINTON
United States Attorney

Recommended Bond: Bond as previously imposed.